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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA, SOUTHERN DIVISION**  
12

13 GAIA ETHNOBOTANICAL, LLC DBA  
MITRAGAIA,

14 Plaintiff,

15 vs.

16 T1 PAYMENTS, LLC; PAYVISION  
17 B.V.; and DOES 1-10 and ROE  
Corporations 1-10,

18 Defendants.  
19

Case No. 2:22-CV-01046-CDS-NJK

**STIPULATION AND ORDER  
GRANTING JOINT MOTION TO  
STAY PROCEEDINGS**

**[SPECIAL APPEARANCE ONLY]**

Judge: Cristina D. Silva

1 IT IS HEREBY STIPULATED AND AGREED, by and between all interested parties  
2 to this stipulation, Plaintiff GAIA ETHNOBOTANICAL, LLC DBA MITRAGAIA  
3 (“Gaia”), by and through its counsel, the law firms of Allen & Associates and The Law  
4 Offices of David Liebrader, and **BY SPECIAL APPEARANCE ONLY**, Defendant  
5 PAYVISION B.V. (“Payvision B.V.”), by and through its counsel, the law firms of Gibbs  
6 Giden Locher Turner Senet & Wittbrodt and Musick, Peeler & Garrett LLP (collectively,  
7 the “Parties”), stipulate and agree as follows:

8 1. On May 18, 2022, Gaia filed a civil action in the Eighth Judicial District Court  
9 in Clark County, Nevada.

10 2. On July 1, 2022, T1 Payments LLC (“T1”) filed a notice of removal to remove  
11 Gaia’s civil action to this Court. T1 attached Gaia’s First Amended Complaint (“FAC”) as  
12 Exhibit 1 to its notice of removal.

13 3. On September 6, 2022, Payvision B.V. filed a Motion to Dismiss the FAC  
14 (“Payvision B.V.’s Motion to Dismiss”).

15 4. On September 21, 2022, Gaia filed an Opposition to Payvision B.V.’s Motion  
16 to Dismiss.

17 5. On October 5, 2022, Payvision B.V. filed a Reply to Gaia’s Opposition to  
18 Payvision B.V.’s Motion to Dismiss.

19 6. The Court has not yet ruled on Payvision B.V.’s Motion to Dismiss.

20 7. On December 22, 2022, Gaia and Payvision B.V. reached a tentative  
21 settlement.

22 8. To allow Gaia and Payvision B.V. time to negotiate the terms of the settlement  
23 agreement and to not jeopardize the settlement, the Parties agree that the Court should stay  
24 the proceedings as it relates to Payvision B.V.’s Motion to Dismiss for twenty-one days, *i.e.*,  
25 to January 16, 2023.

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27 ///

28 ///

9. The Parties submit that good cause exists to warrant the agreed to stipulation.

Respectfully submitted,

December 27, 2022

THE LAW OFFICES OF DAVID LIEBRADER

By */s/ Adam Allen*

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December 27, 2022

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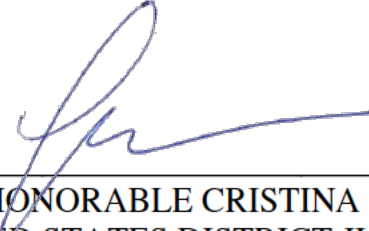
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*Attorneys for PAYVISION B.V., a Netherlands  
limited liability company*

**ORDER**

Based on the foregoing, **IT IS SO ORDERED.**

IT IS FURTHER ORDERED that the parties must file a joint status report on or before February 1, 2023, to keep the court apprised of any updates.



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THE HONORABLE CRISTINA D. SILVA  
UNITED STATES DISTRICT JUDGE

DATED: January 3, 2023